

Exhibit G

Blume, Michael (USANYE)

From: Stamatelos, Pauline (USANYE)
Sent: Tuesday, April 11, 2023 4:12 PM
To: Caleb Kruckenberg; Steve Simpson; Jonathan Houghton
Cc: Marutollo, Joseph (USANYE); Blume, Michael (USANYE); Merenda, Jill (USANYE)
Subject: RE: US v. Rare Breed Triggers, No. 23-369 Discovery, Service

It includes the credit card number. It does not include the card holder's name or address.

From: Caleb Kruckenberg <CKruckenberg@pacificlegal.org>
Sent: Tuesday, April 11, 2023 4:11 PM
To: Stamatelos, Pauline (USANYE) <PStamatelos@usa.doj.gov>; Steve Simpson <SSimpson@pacificlegal.org>; Jonathan Houghton <JHoughton@pacificlegal.org>
Cc: Marutollo, Joseph (USANYE) <JMarutollo@usa.doj.gov>; Blume, Michael (USANYE) <MBBlume@usa.doj.gov>; Merenda, Jill (USANYE) <JMerenda@usa.doj.gov>
Subject: [EXTERNAL] RE: US v. Rare Breed Triggers, No. 23-369 Discovery, Service

Can you clarify this line --“the only customer information that will be disclosed by the records sought by the United States includes credit card information and transaction dates”? I assume credit card information includes the name of the credit card holder, and likely an address. If that’s the case, then we have the same objection we’ve been discussing. If this doesn’t include names or addresses, then we don’t object.

Also, for the dates, I can meet you halfway and have our response due April 28th (Friday), and agree to the other dates.

Caleb Kruckenberg | Attorney*
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202.888.6881 | Office
*Admitted to practice in DC, NY, PA and VA



PACIFIC LEGAL FOUNDATION

Defending Liberty and Justice for All.

From: Stamatelos, Pauline (USANYE) <Pauline.Stamatelos@usdoj.gov>
Sent: Tuesday, April 11, 2023 2:09 PM
To: Caleb Kruckenberg <CKruckenberg@pacificlegal.org>; Steve Simpson <SSimpson@pacificlegal.org>; Jonathan Houghton <JHoughton@pacificlegal.org>
Cc: Marutollo, Joseph (USANYE) <Joseph.Marutollo@usdoj.gov>; Blume, Michael (USANYE) <MBBlume@usa.doj.gov>; Merenda, Jill (USANYE) <JMerenda@usa.doj.gov>
Subject: RE: US v. Rare Breed Triggers, No. 23-369 Discovery, Service

Hi Caleb,

With respect to scheduling, so that the parties have adequate time to prepare for the PI hearing, we think an earlier briefing schedule is necessary. We propose April 26 for Defendants' opposition to the PI motion, and May 8 for the

Government's reply. We would also propose the parties exchange witness and exhibit lists by May 12 with motions in *limine* to be filed by May 18. Please advise and we can file a proposed schedule.

With respect to the third-party subpoena served on Chase Paymentech, LLC, according to a subpoena processing agent with JPMorgan Chase, the only customer information that will be disclosed by the records sought by the United States includes credit card information and transaction dates. The IRS transaction summary only provides gross sales figures, as well. In other words, we are not getting customer names or addresses. To account for the credit card information that will be disclosed in these records, we attach Magistrate Judge Levy's standing confidentiality order which we would like to present to the Court to so order tomorrow.

With respect to Iberia Bank, although we did not discuss that subpoena at length, it is our understanding that only third-party dealers used that bank to transact with RBT. If that is the case then do you withdraw your objection? If that's not the case, then we will follow up with Iberia. But we would like some confirmation on your end.

With respect to the JPMChase subpoena, no retail customer information is sought.

Thanks,
Paulina

From: Caleb Kruckenberg <CKruckenberg@pacificlegal.org>
Sent: Tuesday, April 11, 2023 1:53 PM
To: Stamatelos, Pauline (USANYE) <PStamatelos@usa.doj.gov>; Steve Simpson <SSimpson@pacificlegal.org>; Jonathan Houghton <JHoughton@pacificlegal.org>
Cc: Marutollo, Joseph (USANYE) <JMarutollo@usa.doj.gov>; Blume, Michael (USANYE) <MBlume@usa.doj.gov>; Merenda, Jill (USANYE) <JMerenda@usa.doj.gov>
Subject: [EXTERNAL] RE: US v. Rare Breed Triggers, No. 23-369 Discovery, Service

Pauline:

To follow up on our conversation yesterday.

1. We wouldn't object to your subpoenas to the extent that they would reveal only anonymous customer information. As we discussed, we also don't object to targeted requests for *non-anonymous* information related to chargebacks, returns or customer complaints. I'll look for your redlines soon. In the interest of timing, if we can't reach an agreement by COB tomorrow, I'll need to file a motion to quash.
2. With respect to scheduling, I'd propose that Defendants' response to the PI motion be due May 5th, and your reply (if any) due by the 19th. That would make the issue fully briefed at least a few days in advance of the hearing.

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Defending Liberty and Justice for All.

From: Stamatelos, Pauline (USANYE) <Pauline.Stamatelos@usdoj.gov>
Sent: Friday, April 7, 2023 3:23 PM
To: Steve Simpson <SSimpson@pacificlegal.org>; Caleb Kruckenberg <CKruckenberg@pacificlegal.org>; Jonathan Houghton <JHoughton@pacificlegal.org>
Cc: Marutollo, Joseph (USANYE) <Joseph.Marutollo@usdoj.gov>; Blume, Michael (USANYE) <Michael.Blume@usdoj.gov>; Merenda, Jill (USANYE) <Jill.Merenda@usdoj.gov>
Subject: RE: US v. Rare Breed Triggers, No. 23-369 Discovery, Service

Hi Steve, what time after 2:30 pm on Monday works for you? thanks, Paulina

From: Steve Simpson <SSimpson@pacificlegal.org>
Sent: Friday, April 7, 2023 2:56 PM
To: Stamatelos, Pauline (USANYE) <PStamatelos@usa.doj.gov>; Caleb Kruckenberg <CKruckenberg@pacificlegal.org>; Jonathan Houghton <JHoughton@pacificlegal.org>
Cc: Marutollo, Joseph (USANYE) <JMarutollo@usa.doj.gov>; Blume, Michael (USANYE) <MBlume@usa.doj.gov>; Merenda, Jill (USANYE) <JMerenda@usa.doj.gov>
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Counsel, please be advised that Defendants intend to move to quash the subpoenas to the extent they seek our clients' customer lists. Based on Judge Morrison's statements in the recent status conference, we don't believe that the Government is entitled to customer lists. We are happy to discuss the issue further if you have any questions or if there is some chance the Government would narrow its subpoenas. Caleb is traveling today and I'm on the west coast, so Monday would work best for us. Thanks.

Steve

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Defending Liberty and Justice for All.

*Member of the bars of New York, New Jersey, the District of Columbia, and California

From: Stamatelos, Pauline (USANYE) <Pauline.Stamatelos@usdoj.gov>
Sent: Wednesday, April 5, 2023 11:55 AM
To: Caleb Kruckenberg <CKruckenberg@pacificlegal.org>; Steve Simpson <SSimpson@pacificlegal.org>; Jonathan Houghton <JHoughton@pacificlegal.org>
Cc: Marutollo, Joseph (USANYE) <Joseph.Marutollo@usdoj.gov>; Blume, Michael (USANYE) <Michael.Blume@usdoj.gov>; Merenda, Jill (USANYE) <Jill.Merenda@usdoj.gov>
Subject: US v. Rare Breed Triggers, No. 23-369 Discovery, Service

Counsel,

Consistent with the Court's order, please see attached.

Thank you,
Paulina Stamatelos